

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

OLUTAYO ARIYO :
Plaintiff

CIVIL
No. 2:23-cv-02835-NIQA

A TRIAL BY JURY REQUESTED

THOMAS JEFFERSON UNIVERSITY
MEDICAL COLLEGE

Defendants

Expansive Details Underlying Recent Request For Amendment /Or Total Replacement of Amendment FAC of 10/23/2024.

I am not the personality Defendant Attorney sought to paint with a dark brush as contained in their filed motion of 04/16/25 asking the Court to deny my Motion requesting an amendment to FAC This is an addendum to that Motion filed earlier that Court does not grant Defendant Attorney Motion asking Court Not to grant me opportunity of an amendment / or a total replacement to my First Amended Complaint (FAC) filed by my former Lawyer as latter was greatly flawed, riddled with many wrong transposed facts, deficient in pointing out gross violations by various decision makers, hiring and pay levels discriminations, promises made and reneged, and despite all the road blocks, scuttled and intentionally delayed promotion, having endured the much toxic hostile environment, overt RACISM whereby was replaced in giving the first 2 lectures I gave over some years , while trying to placate lamentations from the SON to a TRUSTEE lamenting why their 1st 2 Lectures in Medical school were given by a BLACK MAN, 12 of my 17 years in employment were STOLEN , rubbished, dishonored, was made irrelevant later weaponized as “ no enough Time In Rank “ and other subjective reasons, to deny my request to be promoted a FULL PROFESSOR, on 6/21/2022. I am ready to buttress and proof a valid prima facie case, the presumption that TJU unlawfully discriminated against me, equally ready and fully prepared to show that the TJU's proffered reason for the promotion decision denial were actually a pretext for discrimination, knowing too well that despite the many huddles, vindictiveness, I had met the minimum qualifications for the job, but because several TJU Decision makers failed to follow TJU laid that personnel hiring and promotional policies , and most especially in the promotion process, resorting to use subjective proffered reasons, unworthy of being believed as decision was not purely academic, and so

fundamental to academy is that basing arguments on data and drawing conclusions from systematic analysis is fundamental to the academy. Latter were dishonored. There were several cases several Institutional Authority figures ignored using specific performance measures to identify my progress in research, teaching, and service, to objectively ensure evaluations of teaching, research, and service are equally applied. during the promotion process

I am yet to get over the shock of the Defendant Attorney betrayal, likened to same I encountered in 2005 at Thomas Jefferson University (TJU) a trust also betrayed, Late Professor Schmidt, then Vice Chairman who promised recommending me for the Assistant Professor position, offered a Research Associate position intended to temporarily cover the credentialing period. I accepted this based on trust. Ditto, I cooperated with Defendant Attorney who had approached me for my consent which I enthusiastically gave over the phone, prelude to filing a Motion for a 2 month -extension, which the Court granted, a new date 2/18/2025 as the new deadline for discovery closure.

Prior to the deadline, on 1/29/2025, Defendant Attorney filed a Motion for the Dismissal of my case as Defendant 's motion to dismiss or failure to comply with Discovery Obligations were premised among other reasons included that 'Plaintiff compliance with his discovery responsibilities has been an ongoing issue throughout this litigation". I may not be privy to the engagements between my former Attorney and Defendant's Attorney as to how many of the Discovery matters made available to my former Attorney shared with Defendants Attorney before we parted ways due to unreconcilable differences.

(Exhibit 1&2 were evidence I was and ceaselessly too, putting my Pre se Complaints, but a Motion to dismiss case

ahead of the 2/18/2025, rattled, caused a lot of confusion, hence the delay in submitting this, and was relieved after Motion got Dismissed and became confident, then a motion to Court thereafter to allow me amend/replace FAC filed on 10/23/2023 by my former Lawyer. As a Plaintiff, I struggled many times arguing FAC was deficient and tangential to what my Case was about, unfortunately my Intake Lawyer was changed mid-stream and a new set of problems began,

I became a Pro se litigant not by choice, but by default on 10/11/2024. Although I quickly filed a counter motion, against the dismissal motion by the Defendant Attorney, thank God, but seeking a technical path to get my case dismissed was so shocking and seen as a betrayal a motion to dismiss filed well ahead of the 2/18/2025 extension that I gave consent to.

I hereby forwarded proof of what I had engaged myself doing, (Exhibit 1&2) when I became a Pro se litigant, working on my intended replacement complaints as the FAC filed by my lawyer was so highly flawed and for which I argued vehemently against **(Exhibit 3)** with my lawyers, as they were more focused on a Title VII Discriminatory pathway which no doubt could be easily legally prosecuted, but my case I argued with former lawyer was much bigger than that- that of a mutilated handling of my career, many huddles on my path, breach of contract, the many acts of untruthfulness, a prolonged Time-In Rank (TIR) as decision makers became vindictive, seeking a pound of flesh with such cruelty and venom that 12 of my 17 years were wiped out due to promises made, promises unkept, a knifing of my career with a sharp knife at infancy a house built with a sand foundation as a result of authority figures not telling the truth, most dis-heartening was when these many mal and unprofessional behaviors were made known to higher Governance echelon and TJU Counsel, regretfully all these were swept under the carpet, TJU condoning

so much illegality as their official decision makers were having a field day traumatizing an innocent employee, including peddled lies and a threat to dismiss, not until a GOD-sent Incoming Chairman , Prof. Peiper duly investigated these peddled lies of Teaching ineffectiveness (an attempt at giving a dog a bad name to get it hung) ,Professor Peiper sending 2 Professors ANNONYMOUSLY to observe my lecture delivery and with feedbacks of VERY GOOD and EXCELLENT respectively. This did not happen until after 7 years (2005-2012) of financial exploitation such that when I became formally regularized a Faculty in 2013 I had lost over \$400000 in denied commensurate salary, based on my academic background, skills and experience as well as job responsibilities. 2 other colleagues Dr, Hector Lopez and Dr. Zhang, same medical degree, both with a combined experience miles away from my 23 years' experience in 2005, but were on a salary of \$90000/yr plus paid retirement benefits, while all the 3 of us performed same job responsibilities, both however were NON -BLACK, NON-NIGERIAN,

That destabilization stemming from a premeditated and precocious Motion to dismiss filed by Defendant Attorney and the hanging doom, not sure motion might be granted were paralytic. This was a coup, a double crossing by Defendants Attorney

Below were my efforts after I became a Pro se, after 15 months I was with my former lawyer- 15 wasted months !!!!!!! NIL PROGRESS made, was like Starting all over on 10/11/2025.

1. Forwarded Defendant some 26 Discovery Documents
2. Completed some 30 or more questionnaires requested, 83 pages on completion which were returned to Defendant Attorney.

3. When I attempted downloading the same questionnaires on my computer and these and some other documents from Defendant Attorney were not downloadable and hence inaccessible, Defendant Attorney graciously saved this in a word format on a flash drive, I opted to physically drive down to the 1500 Market Street Defendant's Office to pick this up in person.

4. On or about 12/13/2024, Defendant Attorney reached out to me asking if I would support a Motion asking Court for extension on deadline for Discovery submission. I did not hesitate to give my consent. The Court granted Motion to extend this till 2/18/2025.

5. I was now focused on putting together my pro se litigations as I now had to address the many unprofessional lapses, transposition of dates, the exact Ranks I was applying for, their dates, outcomes which were so disjointed, even the case of a voluntary retirement cited a resignation, These if not amended would result in Defendant Attorney would easily make a dispositive Summary dismissal.

Here is Chronology of Events between my former lawyers Mallamut & Associates and me.

I am hoping that on reading this chronicle, Defendant Attorney will do away with the negative stereotypes they unfortunately they had me portrayed.

1. 4/26/2023: EEOC granted me power to sue.

2. 6/1/2023. Docusign electronically the agreement empowering Mallamut & Associates as my Plaintiff Attorney
3. 7/17/2023. Sent an e- mail (an SOS) crying aloud to my former Lawyers: "DEADLINE LESS than 1 week away!!!.
4. (EXHIBIT 4)

4, Between 6/01/23 and 7/ 21/2023.
Only 1-2 calls between my Lawyers and myself. Most scheduled phone calls were cancelled.

5. 7/20/2023 .in a phone call with my lawyer I insisted I needed to come in on 7/ 21/2023 as against Monday 7/24/2023 Mallamut & Associates wanted me to stop by .This was my first Meeting one on one with my lawyers.
6. No wonder my first filed Complaint by my lawyer was a **Placeholder** on or about 7/ 25 / 2023, reflecting an almost non – preparedness on the part of my Attorney
7. 10/23/2023. First Amended Complaints filed.

For almost 50 days I had docusigned the retainer agreement with my former lawyer, my meeting face to face occurred 11th hour to deadline to file! !!!!!. **EXHIBIT 5**

Thank God but for my intervention my Attorneys would have missed the deadline for filing.

That was not a "**cavalier**" attitude as I had been painted by Defendant Attorney, while filing a motion to crush my Motion my seeking amendment to my FAC, or a replacement by my own pro se litigation complaints.

All above events contained in my 7/17/2023 communication with Paralegal Maria Malone- no doubt a very professional and active Paralegal to Mallamut & Associates- always would give prompt attendances to my enquiries and requests. (EXHIBIT 5)

On the Meat of what my Case was all About.

A copy of my 6/ 24 /2024 communication with my former Attorney highlighted the crux of my case. For many months I was with my former Lawyer, the greatest sore point was my consistent stressing what my Case was all about.

Central to these was the Vice Provost letter of 6/30/2022, **(Exhibit 3)** which coincided with my last day of 27 years of service to TJU (no doubt this was not unconnected with a diabolical role TJU had engaged in to run out time on me, as my loud reach out to the Vice Provost on the perceived absence of evaluation did not follow the standard periodic evaluations of my progress as laid out in TJU Faculty Handbook , a mandatory 2 year evaluation is the standard protocol. My letter to the Vice Provost on the need for an evaluation was either 10/2021 or 11/2021 at least 8-9 months to my retirement, crying out to the Vice Provost on or about 10/21 or 11/21 .

Again, waiting to a week to my retirement tells a lot, as the only thing TJU had in mind was a Greek Gift offer of promotion to Clinical Associate Professor, when grandfather were required minimum of 10 PRP, which i had achieved end of 2018/beginning of 2019!!!!!! TJU did not require any international invitations/ Recognitions for the Associate Professor Rank, in 2018 I have had 9, hence why I requested for a backdating and back pay on 6/24/2022 The rest is history .TJU had successfully ran time out on me.

PREMEDITATED,

My lawyer and I had so much irreconcilable approaches as to what my case was and what I were my demands. for.

My former Lawyer focused as if the entire argument was solely a Title VII issue, and their argument was I had no SMOKING GUN to support this. Although very suspicious of how my Lawyers got irritated not going along with my mission and vision , most especially , the issue of Scholarship and subjective proffered reasons by TJU are not to be believed, many potent cases of discriminatory practices, I had to draw a red line as my lawyer towards our separation had said, ***“Dr. Ariyo, your case is not worth more than \$20000 in settlement.”*** This was same Lawyer who has called me on or about 10/29-30 /2023 while attending a wedding function in Toledo Spain, if they could go ahead to ***SETTLE Case for \$125000.***

Suspicious as to where these were coming from without any prior discussions with the Plaintiff-Me- nor was I told such were offered by Defendants. So, when 10 months after, the most ridiculous belittling and frivolous assessment of my case- my lawyer claimed was not worth more than \$20000 on settlement, that was the final straw.

I have gone into these interactions as Defendant was trying to weaponize and label what they perceived me as,

Plaintiff trying to “flout procedural rules”.

Plaintiff blaming his previous Attorney “.

Plaintiff was unrepresented since Sept. 11, 2024- Not true, as I became pro se on 10/11/2024 having failed to secure a new Lawyer after the 30 days opening to find a new lawyer granted by the Court.

Here was where the sabotage came from. Earlie Motion for dismissal even before the extension deadline rattled, confused

and unexpected as I had given consent to Defendant Attorney's Motion for an extension to discovery matters submission deadline

Maybe it is time for me to ask from the Defendant Lawyer if they received any of the "tons" of Discovery materials sent to my former Attorney before we parted ways (**Exhibit 4**)
I had shared with my former Attorney the diabolical role played by Dr. Spudich (one of the 3 colleagues I had reported to the Faculty Ombudsman who had created a very toxic hostile working environment for me- others Prof. Schmidt and Dr. Guiyun Zhang, same Dr. Spudich, latter I thought retaliated later disenfranchising my visibility in Faculty Assignment in the lab., almost at the point of making me a permanent FLOATER until this was made illegal and struck down by the Vice-Chairman when I filed a complaint, even though Dr. Spudich later finetuned another discriminatory disenfranchisement pathway, a 2 -tier hierarchical pairing , 2 Faculty Members in a dissecting, room, the LEAD and the other FACULTY.

In 24 opportunities available to 5-6 Faculty members between 2019-2022, , was the only Faculty not given a LEAD position- even though by then I was virtually the most experienced.

I shared how Dr. Spudich sabotaged my access to Discovery matters this by violating Directives given by Chairman, that I have to be present when this were to be carried out. The rest is history. Dr, Spudich substituted herself for me as she probably thought she knew me better than me, and what were my "personal documents-Another Greek Gift- the External drive she handed over to me were simply "her choices".

(EXHIBIT 5)

To Defendant Attorney, were above e mails confirming the diabolical role Dr. Spudich had played. These e mail communications shared with my former lawyer I expected should have been shared with Defendant Attorney (EXHIBIT 2)

Again, to me would ask “ What are the roles Lawyers are for in this my relationship with my former Attorneys. I expected such important information to have been shared with the Defendant ATTORNEY to have avoided such character assassination like “An attempt to seek an amendment was just the case of “***his self-inflicted deficiencies***”.

To me, was so prejudicial for Defendant Attorney to go ahead requesting a Dismissal ahead of the Deadline Extension. Defendant Attorney had questioned why I was “blaming my former lawyers for the “inartful pleadings”. Yes, their inadequacies were many as I had recounted above

An analogy, as between a patient and his/her medical Doctor.

A patient is expected to give as much as his/her symptoms, same as is expected a plaintiff be as well detailed at deposition, the patient and the client be as truthful and thorough.

The Doctor and the Attorney are expected to put on their professional thinking caps, reaching diagnosis or legitimate implications of client’s complaints and thereafter plan surgical or medical interventions while the Lawyer had to determine how to convey Plaintiff allegations robustly to the Defendant Attorney.

Have listed how I discharged what are expected-All and in its truthfulness of my Case. I had helped my Lawyers in not missing the deadline for filing my case, and shared details of case so much exhaustively narrated

Some similarities in handling my employment by TJU and my former Attorney

.. From the 6/30/2022, inferences from these are as follows

(EXHIBIT 6)

1. TJU playing the Ostrich and in 17 years, was alright hiring an MD, mis-designating him a Research Associate allowing him to give FORMAL Lecture an ILLEGAL Act as a Research Associate is not one of the 4 recognized academic ranks-recognized in Colleges and Universities in the USA. Recognized academic ranks are the followings. Instructor, Assistant, Associate and Full Professors as recognized by American Association of University Professors (AAUP)..
 - 2.
 3. TJU are turning the other eye, as if it was alright for a Medical Doctor with 23 years' experience in 2005 a salary of \$40000/year. TJU was more than this- a pathological behavior on the part of TJU Governance who should know better.
 4. That TJU Governance failed to address such a harrowing and cruel academic and financial exploitation even though my complaints to the Faculty Ombudsman were forwarded to TJU Decision makers
 5. TJU still would not factor the 1 YR Time In Rank (TIR) between Instructor and Assistant Professor became 5 Years TIR. The 2 Divisional leaders (Late Prof. Schmidt and Dr, Spudich responsible for this heinous inhuman, vindictive behavior tantamount to seeking " a pound of flesh, knowingly submitted a misleading student evaluation.
 6. The delayed promotions by 4 years plus the earlier 8 years of mis-designation, a total of 12 years, perpetrators of such highly punitive and despicable behaviors were not made accountable by TJU.
 7. TJU failing to address collateral damages resulting from highly unprofessional and odious behaviors by Institutional decision makers tantamount to power abuse.
- Time In Ranks from their cruel behaviors became DISTORTED

Any requests for promotions down stream that fails to factor such crucifixion of 12 years denied an employee means a deviation from Institutional laid down protocols, and a systemic use without such corrections “technical interpretation and adherence very dishonest as far as TIR goes as part of the “minimally required: standard protocol in promotion process is disingenuous, and a an egregious travesty of justice when TJU weaponized this as “no enough TiR” to have given me a promotion much earlier.

Regardless, let us even pretend there were no untruthfulness, no reneged promises, no peddled lies and a threat by Late Professor Schmidt , the threat to get me dismissed, relying on a psychotic deranged lies by a surrogate, Dr, Zhang who can for God’s sake told other colleagues I was not coming to an official University, telling Colleagues “Tayo was not coming because he was probably SLEEPING” in his Office, completing her hatched job returning to the dissecting room after the invigilation assignment to meet Late Prof. Schmidt and asked “Prof. Schmidt, did you see Tayo “.The much sleaze ,a colleague integrity challenged, dubious, will do everything to advance her career, by throwing others under the bus to achieve this.

Other collateral damages, scientific scholarly growth truncated, delayed progressive ladder climb to higher ranks and associated pay increase rubbished and finally the last day of my retirement 6/30/2022, the very non compassion, subliminal arrogant and condescending remarks, the making a Greek Gift of a mutually agreed offer of a promotion to Clinical Associate Professor now made contingent from intimidating threats to give up my rights, the admission by TJU I was only entitled to the slave era -like discriminatory earnings and denied benefits: THE BIG QUESTION

Were my academic credentials as at 6/21/2022 at the ZOOM meeting with the Vice Provost Professor Novielle even when this was denied for a review and determination,
DID MY ACADEMIC CREDENTIALS MEET THE MINIMUM REQUIRED BY TJU FOR PROMOTION TO A FULL PROFESSOR RANK I REQUESTED FOR.

2020. Requesting to be promoted Clinical ASSOCIATE Professor during my Faculty Review Performance with the Vice Chairman, Prof. Menko, despite with 16 PRP vast international recognitions one of the 3 comments cited as negative evaluation was “DR, Ariyo, a female student accused you of rolling your eyes when she failed to give a correct answer to a question? Really? So bizarre and unworthy of being dignified. If academics would view such subjective or possibly concocted frivolous accusations, and weaponized to deny a request for a promotion, then Academics is now something else and such high deference to subjective reasons a deterrent to scholarship by Professors.

Any Promotions I requested for post- 2018 that FAILED TO FACTOR in those LOST 12 years entirely caused by an Authority figure employee, TJU is morally wrong, unfair an injustice a gross egregious travesty of justice. If proffered reasons given by TJU for promotions requested in 2020 and 2022 were as subjective, in 2020, a student claimed I “ rolled my eyes “ when she got a question wrong and a Group were not comfortable I had asked a question from the lower limb while they had completed and were dissecting upper limb (what even if I did) or when in 2022, after 40 years of experience , technically weaponizing “ no enough time in Rank, these proffered reasons cannot be more subjective.

Again most important questions that needed to have been addressed- “Did my academic credentials on 6/21/2022 meet the minimum required for promotion to the Full Professor position?

Below, culled from my 2022 CV were my academic credentials as at 6/21/2022, when I requested for this.

Report of Scholarship

Manuscripts Published (Peer Reviewed)

1. C.L. Mills, **O. Ariyo**, K., M. Yamada, J. W. Lash , and Ruth Bellairs. (1990). Evidence for the involvement of Receptors for Fibronectin in the Promotion of Chick Tail Segmentation. Anat Embryol 182(5):425-434

2. **Ariyo O (2015)** . A Segmental Hypoplastic Anterior Tibial Artery Coexisting with an Hypertrophied Perforating Fibular Artery. A Case Report and Clinical implications. Int. J. Morphol., 33(1): 19-23.
- 3 **Ariyo O (2015)** Coupled Multiple Musculo-neurovascular Variations in Same Upper Limb. A Case Report and Clinical sSgnificances. Int. J Morphol. 33(4):1406-1410.
- 4 4.**Ariyo O, Fenderson, B. (2016).** A Variant of the Classical Superficial Brachioulnoradial Artery. Morphology and Clinical Significances. Journal Surgical and Radiologic Anatomy38 (6) DOI 10.1007/s00276-015-1605-6
5. **Ariyo O, Shea JR. (2016).** Bilateral Bifid Median Nerve. High Origin of Its Palmar Cutaneous Branch, Bifid Median Nerve in Association with Accessory Forearm Muscles and their clinical implications. Int. J. Morphol., 34(3): 997-1001.
6. **Ariyo O, Shea JR (2018).** The Medial Brachial and Antebrachial Cutaneous Nerves of Posterior Cord Origin and Their Clinical Implications Journal of Anatomy and Physiological Studies April 2018
- 7.**Ariyo O, (2018.)** A High Origin Subscapular Trunk and its Clinical Implications Anatomy & Physiology May 2018

8. Ariyo O, Shea JR.(2018) Ulnar-Median Nerve Transposition: Embryology and Clinical Implications. Anat Physiol Vol. 8(6):311

9. Ariyo O. (2018). Raymond Shea Tortuosity in a Bilateral Brachioradial Artery of Dissimilar Arterial Origins and Clinical Implications Anatomy and Physiological Studies J Anat Physiol Volume 1(1):

10. Ariyo, O. (2019). A rare origin of the right vertebral artery and its clinical implications in a proximal occlusion to proximal origin to the brachiocephalic trunk. Ann Cardiovasc Thorac Surg. 2019 Volume 2 Issue 1

11 **Ariyo O. (2019)**A bifurcated axillary artery in its 2nd part and clinical implications Olutayo Ariyo International Journal of Anatomic Variants

12. Ariyo O (2019)Bilateral Co-Existence of Le Minor Type 3 Variant With A 4-Root Median Nerve and Clinical Implications. JRSR- 15406/2019
International Journal of Recent Scientific Research

****13. Ariyo O (2019) An Uncommon Arterial Trunk: Superficial Brachioradiomedian Artery and Its Clinical Significance**

1. *SCIREA Journal of Clinical Medicine.*

***14 Ariyo O. (2019), A Rare Arterial Trunk : The Brachioradiomedian Artery and Its Clinical Implications.**

15, Ariyo O. 2020 A Rare Origin of the Dorsal Scapular Artery and Its Clinical Implications Olutayo A

Journal of American Surgical Case Report. (AJSCR-2020-1-106

Received: 15 January, 2020

Accepted: 27 January, 2020

16.Ariyo O. An Absent Subscapular Artery Co-Existing with Multiple Variants of the Brachial Plexus and Clinical Implications. Cell and Developmental Biology.**2020**. ISSN-2168-9296

17. Ariyo O (2021) A Rare Formation of Lateral Cutaneous Nerve of the Forearm and its Clinical Significance in Anesthesiology Journal of Clinical Anesthesia and Pain Medicine

Received December 03, 2020; Accepted January 03, 2021; Published January 19, 2021

18 Ariyo O . 2021. Left Vertebral Artery with Proximal Stenosis and Clinical Implications. Journal of Cardiology and Cardiovascular Interventions. Open Access

19. Ariyo O. 2021 Left Vertebral Artery with a Proximal Stenotic Origin and Clinical Implications Journal of Clinical Cardiology and Cardiovascular Interventions
December 10, 2020; Accepted: February 08, 2021; Published: February 16, 2021

20. Ariyo.O (2021) Multiple Morphological Radial Artery Variants with Odds of Increased Procedural Complications in Percutaneous Coronary Procedure and Clinical Implications. Interventional Cardiology Journal 2021 : ISSN 2471-8157

Medical Education Abstracts

1. **Ariyo O** and Shea JR (2013) Axillary Artery Bifurcation. Accepted and published by European Association of Clinical Anatomy (EACA) Lisbon, Portugal.
2. **Ariyo O** and Shea JR (2013) Ulnar-Median Nerve Transposition. Accepted and published by European Association of Clinical Anatomy (EACA), Lisbon, Portugal.
3. **Ariyo O** (2014) Bilateral but Dissimilar Brachioradial Artery. Morphology and Clinical Implications. Accepted and published by British Association of Clinical Anatomy.
- 4 **Ariyo O** (2015). Aberrant Right Subclavian Artery Arising distal to Left Subclavian Artery and Its Clinical Implications. American Association of Clinical Anatomy. Salt-Lake City, Utah, Regional conference.
5. **Ariyo O. (2015)** Pictorial Essay on Variant Origins of the Vertebral Artery-

Accepted for Oral presentation at the 2015 Winter Meeting of the British Association of Clinical Anatomy (BACA) London.

6. **Ariyo O. (2015).** Lusoria Dysphagia and Kommerrel Syndrome Accepted for poster presentation at the 2015 Winter Meeting of the British Association of Clinical Anatomy (BACA) London.

7. **Ariyo. O. (2016)** Anatomic Radial Artery Variants with Possible Increased Procedural Complications as Access Vessel In Cardiac Catheterization: A Pictorial Essay. Oral/Platform presentation, American Association of Clinical Anatomists (AACA), Oakland California USA.

8. **Ariyo O (2016)** .External and Internal Carotid Arteries transposition and its Clinical Significance. British Association for Clinical Anatomists. Brighton, England.

9. **Ariyo O. (2016)** Two rare origins of the vertebral arteries and their pathophysiological presentations relative to Subclavian Steal Syndrome. British Association of Clinical Anatomists/ Anatomical Society Brighton England.

10. **Ariyo O. (2016).** Bilateral Carotid Arteries Transposition Co-existing with a Medially placed Right Vagus Nerve. A Discussion of their Clinical Implications. Australia and New-Zealand Association of Clinical Anatomists(ANZACA). (2016)

11. **Ariyo O. (2016)** . Two rare aberrant origins of the vertebral artery and their clinical implications. ANZACA Australia and

New-Zealand Association of Clinical Anatomists (ANZACA). (2016)

12. **Ariyo O. (2017).** The Subclavian Steal Syndrome (SSS) and Its stimulation in 4 Variants Of the Vertebral Artery. British Association of Clinical Anatomy (BACA). Burton-Upon Trent, U.K. Dec. 14th 2017.

13. 3 Aberrant RSA **(2018)** Morphology and Clinical Implications British Association of Clinical Anatomy (BACA). Cambridge University, June 26th-June 28th, 2018.

14. **Ariyo O. 2018.** A Possible Association Between the Brachioradial Artery and Branching Variation in the Axillary Artery. American Association of Clinical Anatomist. George Washington University, Washington DC

15. **Ariyo O (2019)**“ Anatomic Supra-aortic Vascular Variants and Their Pathophysiology In Stroke Causation. A Pictorial Essay.” International Conference on Neurology, Neurosurgery and Stroke (Amsterdam (June 10-11, 2019

16. Ariyo O.2020 Arterial Variants of the Popliteal Artery and Clinical Implications. . National Meeting, American Association of Clinical Anatomy. Weill Cornell Medicine June 15 - 19, 2020 New York, NY

- 40 Years teaching experience
- 20 PRP

- 17 Approved Abstracts
- 2 Regional Invitation/Recognition
- 2 National Invitation/Recognition
- *14 International Invitations and Recognitions.*

I had no doubt that by 6/30/2022 met the minimum required and was qualified to have been promoted a FULL Professor

(Exhibit 3)

Education.

Voted best in Teaching Clinical Anatomy by Medical, PT & PA students

Directed and singularly Supervised Final Year Anat 404 (YR 2018/2019) Evaluation grades 8.5 to 9.5/10

Director and virtually singularly taught Resident Doctors-ENT, Maxillofacial, Dermatology and Otolaryngology (2010-2020)-Perfect Score

Service

Mallamut & Associates and I parted ways as they never got engaged in this aspect of my case.

There are Title VII aspect, but in addition as Courts may want to defer academic matters to the University, as Plaintiff, required of me is to give vital supporting data- of my academic credentials that would be helpful and

needed for my Attorney to get well informed to assist in arguing my case to secure victory.

Were my Lawyers working for me or on the side of Defendant Attorney?. I knew it was time we parted ways A communicating email between my Attorney and Defendant Attorney, no doubt is very troubling and confirmed the above, of a possible collusion as my Lawyer seemed to have ignored or abandoned me and far more worried I shared less of Discovery matters when it should have been my Attorney on my side, sharing with them the limited Discovery matters shared with them and most importantly sharing communications on how a Staff of TJU sabotaged , violating Instructions of inclusiveness mandated by the Departmental Chairman. .

Since becoming Pro se by Default on or about 10/11/2024, I had:

- 1, Forwarded about 30 Discovery matters shared with my former Attorney to Defendant Attorney

- 2, The about 32 Questionnaires requested by the Defendants were 83 pages when completed and sent back to Defendant Attorney

- 3, I have cooperated with Defendant Attorney in a Motion requesting the Court to grant an Extension for Discovery deadline Extension , later granted by the Court.

4, When documents from Defendant Attorney were incompatible and I could not open this on my computer, I personally drove to Defendant Attorney to pick the flash drive in which the previously forwarded PDF documents were now in words

5, When thereafter Defendant Attorney filed a Motion to get my case Dismissed even ahead of the agreed to 2/18/2025 deadline, I filed an appeal requesting Court not to grant such request. The Court responsibly denied the Motion

6. Was after receiving the denied motion not to DISMISS was I relieved and then submitted a Motion requesting an amendment to my FAC filed by my former Attorney/ or a total replacement most especially in reading through notes /comments sent by Defendant Attorney virtually all had comments of Discovery document irrelevant to Case, and many requested discovery matters were not even returned as the Defendant Attorney captioned them irrelevant to Case- , which may have resulted from FAC filed by my former Attorney, so limited in scope as to Defendant Attorney relied on the latter to have denied these important Discovery documents sent to me. Such documents include but not limited, viz

- Salary scales for the different Academic ranks at TJU between 2005 and 2022
- Faculty Handbook. YRS 2005-2007, 2013 and 2018
- Current credentials and pay scales for Dr.Zhang , 2010-2022
- Most current CV for Dr. Zhang

- Salary payments to Dr, Hector Lopez and his last CV between YR 2005 and 2011
- Official definitions of responsibilities of a Re

I had Reviewed some of the Discovery matters I requested from Defendant Attorney and so frustrating as they had argued some of these were irrelevant to the case. No doubt had been misled by FAC filed by my former lawyer.

A Motion by the Defendant Attorney not to grant amendment to my FAC or that of a total replacement submitting my Pro se litigant Facts will be so much prejudicial to my case as the Defendant Attorney arguments that this might cause a delay in the Court Calendar or increased cost, but it was a trap set by Defendant Attorney for a Dismissal which derailed my thinking and efforts trying to put together my Pro se Complaints which had resulted in in my recent Motion to amend or replace.

Again, was only Pro se by Default .

Finally, I had not wanted my health issues a factor, but if this may be shared not sympathy seeking but letting the Defendant Attorney be less uncharitable with the dark brush painting to smear my person.

About 5/23-5/25 on returning from a long international flight to attend urgent family matters, I underwent surgical embolectomy as my life was spared from dying from a complication of a massive bilateral embolism pulmonary Embolism that must have run had run chronic and it's side

effects on neuronal cells denied of enough oxygen saturation presenting as memory loss struggles which had been made known to my Primary Physician.

In addition, on these dates, viz: 6/30/24, 9/2/24, 10/8/24 and 11/9 /2024, I lost 4 of my High School Classmates 2 of them here in the US were medical colleagues for over 45 years.

Again, sharing these, none- sympathy seeking, but Defendants portraying me most especially being cavalier was offensive to me

From all above I am asking the Court on the path of seeking the truth, a prerequisite for justice , ask for the denial of Motion by Defendant Attorney asking the Court not granting me an amendment to my FAC I had fought seriously against as evidenced by one of my supportive documents , that I found this FAC by my former lawyer not capturing the essence and the gravity of my case .A denial of such request to amend by Defendant Attorney and Again a question to be asked as TJU on 6/30/2022 threatened, intimidated, arm twisting almost asking me to give up my rights, a promotion camouflaged as another Greek Gift and if I wanted this and not even guaranteed that would make me to ask “What is TJU afraid of”?.

Academia is simply- the search for the TRUTH., anything impeding the latter then an enemy of not wanting the true facts of this Case adjudicated upon. FACTS DONT LIE. Anything outside truth makes true justice a victim.

(EXHIBIT 3)

Respectfully, yet again appealing to Court to allow me amend my FAC so mangled by my former Attorney and I

have earlier on given evidence that I argued this many times with my formal Attorney but was not respected, and a denial of Defendant Attorney Motion requesting the Court not granting my request because of a late request, the delay largely caused lately by share sabotaging on the part of Defendant Attorney trying an outsmarting dubiously Signed: Olutayo Ariyo .

Pro se Litigant